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**MEMO ENDORSED**

September 22, 2021

**BY ECF**

Hon. Valerie Caproni, U.S.D.J.  
United States District Court  
Southern District of New York  
40 Foley Square, Room 240  
New York, New York 10007

Re: Mt. Hawley Ins. Co. v. Aegean Land Holdings, LLC  
Case No.: 1:21-cv-06473-VEC

Our File: 499321

Dear Judge Caproni:

This firm is counsel for plaintiff Mt. Hawley Insurance Company ("Mt. Hawley"). In this action, Mt. Hawley seeks judgment declaring that it has fully satisfied any obligations it might have to defendant Aegean Land Holding, LLC ("Aegean") under a commercial property insurance policy in connection with Aegean's claim following alleged damage to its real property following Hurricane Sally in 2020.

On August 3, 2021, the Court issued the Notice of Initial Pretrial Conference (ECF Doc. No. 6) scheduling a Rule 16 conference on October 1, 2021 at 2:30 p.m. Under the Order, a joint letter is due September 23, 2021.

We write to respectfully request an adjournment of the Rule 16 conference (and a corresponding extension of the deadline for the joint letter) to **November 19, 2021**. Aegean has accepted service, and Mt. Hawley and Aegean are engaged in discussions that could resolve this action. We anticipate that the requested adjournment would be sufficient to determine whether the action could be resolved or whether Aegean will need to answer and coordinate with this firm in preparing the joint letter.

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This is our first request for an adjournment. Counsel for Aegean (copied below) has consented to this request.

We are available at the Court's request to provide any additional information or materials. We thank the Court for considering this request.

Respectfully submitted,

DELAHUNT LAW PLLC



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TED:jlj

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By no later than **Friday, October 1, 2021**, counsel for Defendant must file a notice of appearance on the docket.

The initial pre-trial conference, currently scheduled for Friday, October 1, 2021 at 2:30 P.M., is hereby adjourned to **Friday, November 19, 2021 at 11:00 A.M.** Pre-conference submissions are due no later than **Thursday, November 11, 2021**. For a description of the pre-conference submissions requirements and the conference dial in information, the parties should consult the Court's order at docket entry 6.

Plaintiff must serve a copy of this endorsement on Defendant and file proof of service on the docket by no later than **Friday, September 24, 2021**.

SO ORDERED.



Date: September 22, 2021

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE